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August 17, 2001

EXECUTIVE SECRETARIAT

Sara Kyle, Chairman
Director Lynn Greer
Director Melvin Malone
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: *In Re: Docket to Determine the Compliance of BellSouth
Telecommunications, Inc.'s Operations Support Systems with State and
Federal Regulations*
Docket 01-00362

Dear Directors:

On behalf of the Southeastern Competitive Carriers Association, I would like to comment briefly on the memorandum from David Waddell, dated August 15, 2001, regarding the selection of an outside consultant in the above-captioned matter.

First, we believe the TRA and its staff properly expect that whoever is selected as a consultant in this matter should be able to make recommendations to the Authority concerning whether or not additional OSS testing is needed in Tennessee and the scope of any such tests. That, after all, is the purpose of retaining the consultant in the first place.

Second, there are, in fact, at least two other consulting groups (and probably several more) who have the expertise and manpower to conduct the kinds of OSS evaluation requested by the Authority. Either may well be able to accomplish the agency's goals within the Authority's requested timetable. They are:

QSI Consulting, Inc. working in conjunction with Navigant Consulting.
(Mike Starkey, 573-638-2681), and

Maxim Telecom Consulting Group ("MTG") (Richard Schwartz 435-259-2288)

On the other hand, if the Authority does decide to use KPMG, we suggest that the Authority supplement its request with the following :

(1) Ask KPMG to reveal all current contracts between KPMG and BellSouth;
and

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(2) Allow the CLECs to review and comment upon both the scope of KPMG's proposed review and the "rules of engagement" before the Authority grants final approval of those proposals.

Thank you for your consideration of these comments.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker by WLM -*
Henry Walker *I/permission*

HW/nl